

In the Matter Of:

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY

VIDEOTAPED DEPOSITION OF CINDY WILLIAMS

July 29, 2015



100 Mayfair Royal
181 Fourteenth Street
Atlanta, GA 30309
404.847.0999

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY
VIDEOTAPED DEPOSITION OF CINDY WILLIAMS on 07/29/2015

Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS

3 IN RE: NEW ENGLAND)
4 COMPOUNDING PHARMACY,)
5 INC. PRODUCT LIABILITY)
6 LITIGATION.)
7)MDL NO. 2419
8)Master Dkt:
9 THIS DOCUMENT RELATES TO:)1:13-md-02419-RWZ
10)
11 All Actions)
12)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

VIDEOTAPED DEPOSITION OF:

CINDY WILLIAMS

Taken on behalf of the Plaintiffs

July 29, 2015

CARISSA L. BOONE, LCR, RPR



DISCOVERY
LITIGATION SERVICES
Court Reporting • Videography • Trial Presentations

Nationwide Coverage

100 Mayfair Royal
181 Fourteenth Street
Atlanta, GA 30309
404.847.0999
www.DiscoveryLit.com

1 APPEARANCES:

2 For the Plaintiffs:

3 GEORGE NOLAN, ESQ.
4 Leader, Bulso & Nolan, PLC
414 Union Street
Suite 1740
Nashville, Tennessee 37219
615.780.4114
Gnolan@leaderbulso.com

7 and

8 BENJAMIN A. GASTEL, ESQ.
Branstetter, Stranch & Jennings, PLLC
9 223 Rosa L. Parks Avenue, Suite 200
Nashville, Tennessee 37203
10 615.254.8801
Beng@branstetterlaw.com

11 For the Defendants St. Thomas Health,
12 St. Thomas Network and St. Thomas Hospital:

13 YVONNE K. PUIG, ESQ.
ERIC HOFFMAN, ESQ.
14 Norton, Rose, Fulbright, LLP
98 San Jacinto Boulevard
15 Suite 1100
Austin, Texas 78701
16 512.474.5201
Yvonne.puig@nortonrosefulbright.com
17 Eric.hoffman@nortonrosefulbright.com

18 and

19 LELA HOLLABOUGH, ESQ.
Bradley, Arant, Boult, Cummings, LLP
20 1600 Division Street
Suite 700
21 Nashville, Tennessee 37203
615.244.2582
22 Lhollabough@babco.com

23

24

25

1 For the Defendants SSC and Dr. Lister:

2 ASHLEY E. GENO, ESQ.
3 Brewer, Krause, Brooks & Chastain
4 611 Commerce Street
5 Suite 2600
6 Nashville, Tennessee 37203
7 615.256.7728
8 AGeno@bkblaw.com

9 For the Tennessee Clinics Defendants:

10 CHRISTOPHER TARDIO, ESQ.
11 Gideon, Cooper & Essary
12 315 Deaderick Street
13 Suite 1100
14 Nashville, Tennessee 37238
15 615.254.0000
16 Chris@gideoncooper.com

17 Also Present:

18 Molly Moore, Paralegal
19 Leader, Bulso & Nolan, PLC
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

Page/Line

THE WITNESS: CINDY WILLIAMS

EXAMINATION BY MR. NOLAN	7	9
EXAMINATION BY MS. PUIG	45	8
EXAMINATION BY MR. NOLAN	46	2

INDEX OF EXHIBITS

Exhibits	Description	Page/Line
Exhibit 517	Amendment 2 to the BlueSelect Network Ambulatory Surgical Facility Attachment, STE_MDL_004019 to 004022	17 21
Exhibit 518	Amendment 2 to the BluePreferred Network Ambulatory Surgical Facility Attachment, STE_MDL_004023 to 004026	26 4
Exhibit 519	Amendment 3 to the BlueSelect Network Ambulatory Surgical Facility Attachment, STE_MDL_035752 to 035755	28 2
Exhibit 520	July 12, 2012 E-mail with Attachment, STE_MDL_003950	33 24
Exhibit 521	April 1, 2010 E-mail Chain, STE_MDL_035614 to 035616	46 18
Exhibit 522	November 10, 2011 E-mail Chain, STE_MDL_004212 to 004213	54 16
Exhibit 523	October 2, 2012 E-mail, STOPNC-0006491 to0006494	58 16



DISCOVERY
LITIGATION SERVICES
Court Reporting • Videography • Trial Presentations

Nationwide Coverage

100 Mayfair Royal
181 Fourteenth Street
Atlanta, GA 30309
404.847.0999
www.DiscoveryLit.com

1 The videotape deposition of CINDY
2 WILLIAMS was taken by counsel for the
3 Plaintiffs, on July 29, 2015, commencing at
4 9:00 a.m., in the offices of Bradley Arant
5 Boult Cummings, 1600 Division Street, Suite
6 700, Nashville, Tennessee, for all purposes
7 under the Tennessee Rules of Civil
8 Procedure.

9 The formalities as to notice,
10 caption, certificate, et cetera, are not
11 waived. All objections, except as to the
12 form of the questions, are reserved to the
13 hearing.

14 It is agreed that Carissa L.
15 Boone, being a Notary Public and Court
16 Reporter, may swear the witness, and that the
17 reading and signing of the completed
18 deposition by the witness are not waived.

19
20
21 * * *
22
23
24
25

9 Q. Do you know whether when a patient
10 receives an epidural steroid injection at
11 St. Thomas Neurosurgical -- first of all, do you
12 know whether St. Thomas Neurosurgical bills the
13 particular payor for that patient?

14 A. You mean does the center bill for the
15 patient at the facility?

16 Q. Does the center send a bill for that
17 injection to some payor?

18 A. The center bills for the services that
19 are considered the technical components of the
20 facility for that -- to that insurance company.

DEPOSITION ERRATA SHEET

Assignment No. 23054

Case Caption: NEW ENGLAND COMPOUNDING PHARMACY,
INC. PRODUCT LIABILITY

Witness: CINDY WILLIAMS - July 29, 2015

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of
my Deposition taken in the captioned matter
or the same has been read to me, and
the same is true and accurate, save and
except for changes and/or corrections, if
any, as indicated by me on the DEPOSITION
ERRATA SHEET hereof, with the understanding
that I offer these changes as if still under
oath.

Signed on the 10 day of

September, 2015.

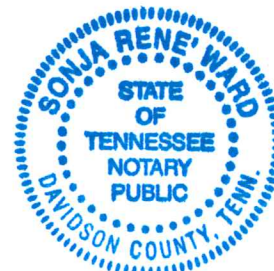
Cindy R. Williams
CINDY WILLIAMS

Sworn to and subscribed before me this 10th day
of September, 2014.

Sonja Rene Ward

Notary Public

My commission expires March 8, 2016



My Commission Expires MAR. 8, 2016

DEPOSITION ERRATA SHEET

Page and line	Change to	Reason for change
GLOBAL	"St. Thomas Health" should be "Saint Thomas Health"	Transcription error
GLOBAL	"St. Thomas Network" should be "Saint Thomas Network"	Transcription error
GLOBAL	"St. Thomas West" should be "Saint Thomas West"	Transcription error
GLOBAL	"St. Thomas Entities" should be "Saint Thomas Entities"	Transcription error
7/13	"Reid" should be "Read"	Transcription error
17/6	"service" should be "services"	Transcription error or misspoke
18/14	"managed care" should be between "provide" and "services"	Clarification
25/1	"multiple" should be "different"	Misspoke
30/1	Change to: "I'm not a licensed" before "person"	Misspoke
32/25	Change "a" to "an"	Misspoke
34/8	Change "a" to "an"	Misspoke
53/16	Change "ACS" to "ASC"	Transcription error
55/5	Change "There's" to "There are"	Misspoke
65/25	Insert "same level of" before "detail"	Clarification

SIGNATURE:



DATE:

